

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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RAYNE VALENTINE,

Plaintiff,

-against-

THE CITY OF NEW YORK; MAYOR BILL DE BLASIO;  
NEW YORK CITY POLICE DEPARTMENT (“NYPD”)  
COMMISSIONER DERMOT SHEA; NYPD OFFICER  
DIMITRI KALININ, SHIELD NUMBER 27547; NYPD  
OFFICER MICHAEL LICATA, SHIELD NUMBER 27684;  
NYPD OFFICER ALNALDO RODRIGUEZ, SHIELD  
NUMBER 27536; NYPD OFFICER DOUGLAS SHEEHAN,  
SHIELD NUMBER 26759; NYPD OFFICER ARTHUR  
VANZILEN, SHIELD NUMBER 29090; NYPD OFFICER  
JOHN VARGAS, SHIELD NUMBER 16643; NYPD  
OFFICER NASIMDZHON MELIKOV, TAX REGISTRY  
NUMBER 964164; NYPD OFFICER STEVEN ZANCA,  
SHIED NUMBER 4377; NYPD SERGEANT ROBERT  
BELLANTONIO, TAX REGISTRY NO. 948651; NYPD  
SERGEANT MATTHEW JOZWICKI, SHIELD NUMBER  
04905; NYPD SERGEANT BILL MORRISSEY; NYPD  
DETECTIVE GABRIEL ECHEVARRIA, SHIELD NUMBER  
6488; NYPD DETECTIVE RAYMOND GORDON, SHIELD  
NUMBER 4592; NYPD DETECTIVE JOHN HOLLAND,  
SHIELD NUMBER 4102; NYPD DETECTIVE AMJAD  
KASAJI, SHIELD NO. 6901; NYPD DETECTIVE WARREN  
ROHAN, SHIELD NUMBER 2378; NYPD DETECTIVE  
MICHAEL SCOLOVENO, SHIELD NUMBER 5901; NYPD  
DETECTIVE ANIBAL TORRES, SHIELD NUMBER 2123;  
and NYPD MEMBERS JOHN DOES 1-11,

Defendants.

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**STIPULATION AND  
ORDER OF  
SETTLEMENT OF  
ATTORNEY’S FEES,  
EXPENSES, AND COSTS**

21-CV-4867 (EK) (VMS)

**WHEREAS**, plaintiff Rayne Valentine commenced this action by filing a  
complaint on or about August 30, 2021, alleging that defendants violated his federal civil and  
state common law rights; and

**WHEREAS**, defendant City of New York served plaintiff with an Offer of Judgment pursuant to Fed. R. Civ. P. 68 on July 13, 2023; and

**WHEREAS**, plaintiff accepted defendant's Rule 68 Offer of Judgment on July 27, 2023; and

**WHEREAS**, all defendants deny any and all liability arising out of plaintiff's allegations; and

**WHEREAS**, plaintiff's counsel represents that plaintiff has assigned all of his rights to attorneys' fees, expenses, and costs to his counsel, Gideon Oliver, Esq., Jessica S. Massimi, Esq., and the law firm of Cohen & Green PLLC; and

**WHEREAS**, counsel for defendant and counsel for plaintiff now desire to resolve the issue of attorneys' fees, expenses, and costs without further proceedings;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, the attorneys of record for the respective parties to the above-captioned action, as follows:

1. Defendant City of New York hereby agrees to pay plaintiff's counsel—Gideon Oliver, Esq., Jessica S. Massimi, Esq., and the law firm of Cohen & Green PLLC—the total sum of One Hundred Fifteen Thousand (\$115,000.00) Dollars in full satisfaction of plaintiff's claims for attorneys' fees, expenses, and costs. In consideration for the payment of One Hundred Fifteen Thousand (\$115,000.00) Dollars, counsel for plaintiff agrees to release and discharge defendant City; its successors or assigns; and all past and present officials, employees, representatives, and agents of the City of New York or any entity represented by the Office of the Corporation Counsel, from any and all claims of attorneys' fees, expenses, and costs that were or could have been alleged in the aforementioned action.

2. Counsel for plaintiff hereby agrees and represents that no other claims for attorneys' fees, expenses, or costs arising out of this action shall be made by or on behalf of plaintiff in any application for attorneys' fees, expenses, or costs at any time.

3. Nothing contained herein shall be deemed to be an admission by the defendant that it has in any manner or way violated plaintiff's rights, or the rights of any other person or entity, as defined in the constitutions, statutes, ordinances, rules or regulations of the United States, the State of New York, or the City of New York or any other rules or regulations of any department or subdivision of the City of New York. This stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations, except to enforce the terms of this agreement.

4. This Stipulation and Order contains all the terms and conditions agreed upon by counsel for defendant and counsels for plaintiff hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation and Order regarding the subject matter of attorneys' fees, expenses, or costs shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein.


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HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel of the  
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By:   
Gideon Orion Oliver  
*Attorney for Plaintiff*

By:   
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*Assistant Corporation Counsel*

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By:   
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By:   
Jessica Massimi  
*Attorney for Plaintiff*

SO ORDERED:

Dated: New York, New York  
\_\_\_\_\_, 2023

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Hon. Eric Komitee  
United States District Judge